

**BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION**

In the Matter of the Reapplication of	)	
the United Way of Greater St. Louis, Inc.	)	Case No. _____
for an Order of the Commission	)	
Granting it Authority as an Information and	)	
Referral Provider for purposes of	)	
obtaining 211 service	)	

**REAPPLICATION FOR 211 AUTHORITY FILED OUT OF TIME**

Comes now the United Way of Greater St. Louis, Inc. (“UWGSL” or “Applicant”), by and through its attorneys, pursuant to 4 CSR 240-32.200 (8) and respectfully submits this reapplication for an order granting UWGSL renewed authority as an Information and Referral Provider and assigning it the abbreviated dialing code 211 for the exchanges listed in this application. In support, UWGSL states the following to the Commission:

1. UWGSL is a nonprofit corporation organized and existing under the laws of the State of Missouri and as defined by section 501(c)(3). Attached as Exhibit 1 is a certificate of good standing for UWGSL issued by the Missouri Secretary of State. A copy of the tax exempt letter issued by the Internal Revenue Service is attached hereto as Exhibit 3. Verification of the application is supplied by Cheryl Polk, Executive Vice President & Chief Strategy Officer of UWGSL and her affidavit is attached hereto as Exhibit 2.

2. Questions or inquiries concerning this Application may be directed to:

Mark W. Comley  
Newman, Comley & Ruth P.C.  
610 Monroe Street, Suite 301  
P.O. Box 537  
Jefferson City, MO 65102-0537  
(573) 634-2266 (Tel)  
(573) 636-3306 (Fax)

and,

Cheryl Polk, Executive Vice President & Chief Strategy and Engagement Officer  
United Way of Greater St. Louis, Inc.  
910 North 11<sup>th</sup> Street  
St. Louis, MO 63101  
(314) 539-4015 (Tel)  
(314) 621-5240 (Fax)

3. Effective May 21, 2007, UWGSL was authorized by the Commission in Case No. TO-2007-0312 to serve as a Missouri Information and Referral (I&R) Provider for the exchanges listed on Exhibit 6 to this Application for a period of three years.

4. Operating under its authority UWGSL has provided service as an I&R Provider in accord with all applicable Commission rules and Missouri statutes, and wishes to continue as the authorized Missouri I&R Provider in the exchanges herein identified.

5. Rule 4 CSR 240-32.200 (8) provides that reapplication for this authority must be submitted at least 90 days prior to expiration of UWGSL's three year authorization. This reapplication having been filed after February 19, 2010 is not timely.

#### **Request for Waiver**

6. Pursuant to 4 CSR 240-2.015, the Commission may waive a rule in Chapter 240 for good cause. Additionally, pursuant to 4 CSR 240-2.050:

(3) When an act is required or allowed to be done by order or rule of the commission at or within a specified time, the commission, at its discretion, may—

\* \* \*

(B) After the expiration of the specified period, permit the act to be done where the failure to act was the result of excusable neglect.

7. UWGSL's failure to submit its reapplication for continuing authority was not intentional but rather was due to an unfortunate oversight caused by circumstances Applicant respectfully requests the Commission to excuse. UWGSL's 211 program was led by and was

under the direction of Melody Kay Archer. Ms. Archer was instrumental in developing the information and referral services program for UWGSL and was active in information and referral organization. Ms. Archer was a former president and board member of the Illinois Alliance of Information & Referral Services (ILAIRS) and a former board member of the Alliance of Information & Referral Systems. UWGSL profoundly relied on Ms. Archer in the provision of its I&R services. Ms. Archer died suddenly on February 1, 2009 and in the management transition that followed after her death, this reapplication and annual reports due the Commission were inadvertently overlooked; however, UWGSL has accumulated all required data and has complied with other Commission requirements through the reporting periods.

8. If the Commission grants the waiver requested herein, no prejudice to the benefits to, or rights and interests of, third parties will result. To the best of Applicant's knowledge, information and belief, there is no other I&R Provider competing for 211 authority within the exchanges listed on Exhibit 6. Although its authority has technically expired, Applicant believes that telecommunications companies from which Applicant obtains its 211 service will permit Applicant to continue provision of I&R services without interruption to its constituencies.

### **Judgments, Annual Reports**

9. Applicant does not have any pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates, which action, judgment or decision has occurred within three (3) years of the date of the application.

10. Annual reports for Missouri state fiscal years 2008, 2009 and 2010 are overdue and they are attached to this reapplication as Exhibit 7. UWGSL respectfully requests that the Commission accept filing of those reports out of time. UWGSL has no overdue assessment fees.

## **Monitoring and Personnel**

11. Applicant's 211 telephone line is and will continue to be monitored by trained Information and Referral Specialists 24 hours a day, 365 days per year. All I&R Specialists will be Applicant's employees.

12. 211 calls are never forwarded to an answering service or machine. Calls wait in queue for the next available I&R Specialist. This queue is monitored by a call center supervisor at all times to ensure appropriate response time; additional call center agents are made available during crises or peak periods, or when the average wait time is excessive.

## **Accreditation**

13. UWGSL adheres to the current version of the Standards for Professional Information & Referral which were revised by the Alliance of Information and Referral Systems, Inc. (AIRS) in June 2009. UWGSL applied for accreditation by AIRS on March 26, 2010 and is in the review phase of that process. UWGSL is preparing the final documentation for submission to AIRS and anticipates achieving accreditation by year's end.

14. UWGSL provides comprehensive services pursuant to the AIRS standards. The inquirer has one-to-one human contact with a trained, paid staff Call Specialist who: assesses the needs of the inquirer, identifies appropriate resources, provides appropriate referral(s), helps inquirers for whom services are unavailable by locating alternative resources, and when necessary, actively participates in linking the inquirer to needed services.

15. Through 211, UWGSL will continue to provide comprehensive I&R services, pursuant to the AIRS Standards, collecting, maintaining and disseminating information about a full range of human services, including but not limited to health, behavioral or mental health, basic needs services such as housing, food, clothing and financial assistance, youth development

programs, services for older Americans, persons with disabilities and families, and resources for individual household and community-wide disaster recovery.

### **Resource Sharing and Collaboration**

16. UWGSL shares, and will continue to share, its resource database with other Missouri I&R providers. A United Way 211 web site ([www.211missouri.org](http://www.211missouri.org)) contains a searchable version of the database, and is be accessible to any Missouri I&R provider, as well as the general public.

17. This database is actively updated in compliance with AIRS standards, which requires formal verification of each organization's profile on an annual basis. Food and financial assistance programs for housing or utilities are updated on a monthly basis. Agencies listed in the data base commit to immediate notification of changes in contact information or programs. Interim changes are verified, made immediately and reflected in the web site in real time.

18. UWGSL has historically worked collaboratively with local area agencies on aging, centers for independent living, child care resource and referral providers, and emergency responders in its traditional service area. The UWGSL works, and will continue to work, collaboratively with local United Ways in Missouri to host informational meetings and develop Memoranda of Understanding with specialized I&R providers across the state.

19. UWGSL works, and will continue to work, collaboratively with The United Way of Greater Kansas City, Inc.,<sup>1</sup> the other 211 operator in Missouri, to consistently measure and evaluate 211 outcomes.

### **Call Tracking System**

20. UWGSL uses an automated call distribution system that enables the call center manager and supervisors to monitor, in real time, the number of incoming calls in queue and

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<sup>1</sup> f/k/a The Heart of America United Way, Inc.

staff accordingly. The system generates data on call volume, the number of calls abandoned in queue, the average speed of answering, and the average length of each call. Call activity data is compiled and analyzed on a weekly and monthly basis.

21. Data is collected for each 211 call and entered by the I&R Specialist into a database at the time of the call. Call documentation includes, for the person needing the service:

- I&R specialist who handled the call
- Date, time and length of call
- Zip code
- Relationship to the person needing service, if other than “self”
- Type(s) of service(s) requested
- Gender
- Language requirements, if other than English
- Accessibility requirements such as ramps, TTY, etc.
- Call resolution, including organization(s) to which the caller was referred
  - Indirect referral; caller was provided full contact information for appropriate service providers.
  - Direct referral; the caller was connected directly with the service provider.
  - Caller requested/received information only.
  - No referral available; documentation of service gap, including reason, if known.
- How the caller learned of 211
- Whether the caller has used 211 before
- Narrative description of call

Optional Data: (as callers have the right to remain anonymous)

- Caller name
- Caller telephone number(s)

22. This information is aggregated, analyzed, and published in the form of quarterly reports to the community on the United Way 211 web site.

### **Other Terms and Benefits**

23. UWGSL removes and excludes human services entities from its resource database for failure to deliver services, fraud, misrepresentation or discrimination. Attached hereto as Exhibit 4 is the 211 Database Inclusion/Exclusion Policy.

24. UWGSL has maintained a computerized database of human services since 1985. This database currently includes information on any services available to residents of metropolitan St. Louis and the State of Missouri for the 99 counties within 2-1-1's service area, regardless of location, including local, state and federal health and human service providers. The database also includes information on agencies providing emergency assistance households throughout the AmerenUE service area and the State of Missouri.

25. UWGSL works with local United Ways throughout the State, state associations and local, specialized I&R providers to expand its existing base of information about health and human service providers in the regions served by 211 prior to launch. Programs are catalogued according to the AIRS Taxonomy of Human Services and regularly maintained according to AIRS Standards by a team of five Resource Specialists working in local communities under the leadership of a 211 Resource Manager. Each Resource Specialist focuses on local resources within an assigned region of the proposed 211 service area. Resource Specialists add, change or delete agency and program information remotely using an internet-based application and assigned user identification to facilitate access to timely information in the 211 Call Center.

26. Caller information is maintained by I&R Specialists in the 211 Call Center. The entity providing overnight coverage utilizes the same system for call documentation.

27. UWGSL ensures the quality of 211 service and caller and customer satisfaction through follow up and written outcome evaluations. Attached hereto as Exhibit 5 is the 211 Evaluation Plan.

28. 211 is accessible to hearing impaired callers via TTY. Callers whose primary language is other than English are served by initiating a 3-way call with an interpreter contracted through Language Line Services.

29. The UWGSL's Volunteer Center is affiliated with the Hands On Network, as are the volunteer centers in Cape Girardeau and Columbia. As such, they have committed to work collaboratively and cross-refer when appropriate. There are eleven other volunteer matching entities in Missouri with whom the UWGSL has regular contact.

30. Applicant possesses sufficient technical, financial and managerial resources and abilities to remain the 211 provider for the telephone exchanges within the counties identified in this application

31. Applicant is ready and willing to abide by Commission rules, regulations and policies; the waiver requested above to apply strictly to this reapplication.

32. UWGSL seeks renewed authority to provide 211 service for all Missouri Counties not currently served by the United Way of Greater Kansas City. This includes exchanges serving the following counties:

Adair County	Hickory County	Perry County
Atchison County	Holt County	Phelps County
Audrain County	Howard County	Pike County
Barry County	Howell County	Polk County
Barton County	Iron County	Pulaski County
Benton County	Jasper County	Putnam County
Bollinger County	Jefferson County	Ralls County
Boone County	Knox County	Randolph County
Butler County	Laclede County	Reynolds County
Callaway MO	Lawrence County	Ripley County
Camden County	Lewis County	St. Charles County
Cape Girardeau County	Lincoln County	St. Clair County
Carroll County	Linn County	Ste. Genevieve County
Carter County	Livingston County	St. Francois County
Cedar County	McDonald County	St. Louis County
Chariton County	Macon County	Schuyler County
Christian County	Madison County	Scotland County
Clark County	Maries County	Scott County
Cole County	Marion County	Shannon County
Cooper County	Mercer County	Shelby County
Crawford County	Miller County	Stoddard County
Dade County	Mississippi County	Stone County



Dallas County  
Daviess County  
Dent County  
Douglas County  
Dunklin County  
Franklin County  
Gasconade County  
Gentry County  
Greene County  
Grundy County  
Harrison County

Moniteau County  
Monroe County  
Montgomery County  
Morgan County  
New Madrid County  
Newton County  
Nodaway County  
Oregon County  
Osage County  
Ozark County  
Pemiscot County

Sullivan County  
Taney County  
Texas County  
Vernon County  
Warren County  
Washington County  
Wayne County  
Webster County  
Worth County  
Wright County  
St. Louis City

The exchanges included in these counties are provided in Exhibit 6 attached hereto.

33. UWGSL submits that approval of this reapplication is in the public interest.

WHEREFORE, United Way of Greater St. Louis, Inc. respectfully requests the Commission to enter an order granting it renewed authority as a Missouri Information and Referral Provider in the telephone exchanges within the counties described herein, together with such other relief and authority the Commission deems just.

Respectfully submitted,

**/s/ Mark W. Comley**

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Attorneys for United Way of Greater St. Louis, Inc.

**Certificate of Service**

I hereby certify that a true and correct copy of the above and foregoing document was sent via e-mail on this 29th day of November, 2010, to General Counsel's Office at [gencounsel@psc.mo.gov](mailto:gencounsel@psc.mo.gov); and Office of Public Counsel at [opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov).

**/s/ Mark W. Comley**

### **EXHIBIT LIST**

Exhibit 1	Certificate of good standing for UWGSL
Exhibit 2	Verification of Cheryl Polk, Executive Vice President & Chief Strategy Officer of UWGSL
Exhibit 3	Tax exempt letter issued by the Internal Revenue Service
Exhibit 4	211 Database Inclusion/Exclusion Policy
Exhibit 5	211 Evaluation Plan
Exhibit 6	Exchanges